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*Attorneys for Plaintiff RLH Assets, LLC*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

ESHA RESEARCH, LLC, an Oregon limited  
liability company,

Plaintiff,

v.

RLH ASSETS, LLC d/b/a FOODWIT, an  
Oregon limited liability company,

Defendant.

Case No. 3:25-cv-00880-JR

**UNOPPOSED MOTION TO EXTEND  
FIRST APPEARANCE DATE**

Under Fed. R. Civ. P 6(b), defendant RLH Assets, LLC (“Foodwit”) moves the Court for an order extending its time to respond to the complaint by 21 days, to July 1, 2025. The parties conferred under L.R. 7-1, and plaintiff ESHA Research, LLC does not oppose this motion.

ESHA filed the first amended complaint on May 27, 2025; under Fed. R. Civ. P. 15(a)(3), Foodwit currently has until June 10, 2025, to respond under Rule 12. But as ESHA noted in related litigation where Foodwit is the plaintiff and ESHA the defendant, ESHA and Foodwit “have agreed that neither will oppose an extension of up to 21 days for the other to file its first appearance in the respective actions,” and that ESHA “intends to file in the transferred case an amended complaint,” after which it “anticipates that Foodwit will likewise file a motion to extend its first appearance time.” *RLH Assets, LLC v. ESHA Research, LLC*, No. 25-656, Docket No. 14 (D. Or. May 12, 2025). ESHA has filed its amended complaint; this is that motion.

Accordingly, Foodwit respectfully requests that the Court grant this unopposed motion to extend its time to respond to the amended complaint to July 1, 2025.

Date: May 30, 2025

Respectfully submitted,

s/ P. Andrew McStay, Jr.  
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